



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

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Donna Singleton, Treasurer
National Republican Congressional
Committee Expenditures
320 First Street
Washington, DC 20003

AUG 30 1995

Identification Number: C00075820

Reference: April Monthly Report (3/1/95-3/31/95)

Dear Ms. Singleton:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-The amount of debts and obligations owed by your committee as reported on the Summary Page conflicts with the amount reported on the loan and/or debt schedule(s) (Schedule C and/or D). Please amend your report to clarify this discrepancy.

-On Schedule D of your previous report, you disclosed a debt(s) owed to Chatelain Architects and Neodata Database Marketing. This obligation(s), however, has been omitted from this report. Please amend your report to include this debt(s) on Schedule D and Line 10 of the Summary Page. All debts and obligations must be disclosed until extinguished. 11 CFR §104.11

-Line 21(a)(i) of the Detailed Summary Page of your report discloses a total of \$872,881.29. The sum of the entries itemized on Schedule H4, however, indicates the total to be \$873,950.52. Please amend your report to clarify the discrepancy.

-Your report discloses a transfer(s) to the National Republican Congressional Committee Non-Federal Account. 11 CFR §§106.5 and 106.6 prohibits a committee's federal account from reimbursing its non-federal account for shared allocable expenses. Also, the non-federal account is prohibited from paying the federal accounts share of these expenses. These types of costs must be

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paid according to the allocation ratio derived from the appropriate method on Schedule H1.

If the transfer(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If your non-federal account has paid any expenditures which should have been allocated, you are advised to correct any non-compliance with 11 CFR §106.5 and 106.6 and establish procedures to insure future compliance with allocation regulations.

Although the Commission may take further legal action regarding this improper allocation activity, your prompt action will be taken into consideration.

-Schedule H3 discloses receipt of \$4,923.96 from your non-federal account for a fundraising event(s) which is listed as 100% non-federal on Schedules H4. A committee is permitted to pay the entire amount of an allocable activity from its federal account and receive a transfer(s) from its non-federal account solely to cover the non-federal share of the allocable expense(s). 11 CFR §106.5(g)(i). However, a 100% non-federal fundraising event does not fall within the definitions of an allocable expense, and constitutes an impermissible transfer of funds received by your federal account from your non-federal account.

The Commission recommends you immediately transfer the total amount received by your federal account back to your non-federal account. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

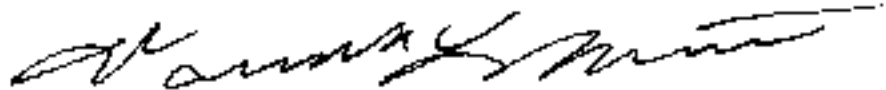
-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Transfers to other party committees should be properly disclosed on a separate Schedule B, supporting Line 22 of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this

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letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,



Donald L. Averett
Senior Reports Analyst
Reports Analysis Division

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